

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

No. 1:19-cv-08655 (LGS)(GWG)

**DECLARATION OF SARA B.
TOMEZSKO IN SUPPORT OF
MOTION TO SEAL**

I, SARA B. TOMEZSKO, subject to the penalties by law for perjury, do hereby declare the following to be true and correct on the basis of my personal knowledge. If called upon to do so, I would be competent to testify to the matters set forth in this declaration.

1. I am an associate at Paul Hastings LLP, a member in good standing of the Bar of the State of New York, and outside counsel for Defendant in this matter. My firm also represents Diane Greene for purposes of her deposition noticed in this matter.

2. Attached to my declaration as Exhibit A are relevant excerpts of correspondence between counsel for the parties regarding plaintiff's request that Google waive confidentiality of certain documents for the limited purpose of filing her opposition to Google's motion for a protective order and motion to quash (the "Opposition").

3. Attached to my declaration as Exhibit B is a true and correct copy of Plaintiff's Exhibit 4 in support of the Opposition, Bates labeled GOOG-ROWE-00017583.

4. Attached to my declaration as Exhibit C is a true and correct copy of Plaintiff's Exhibit 6 in support of the Opposition, Bates labeled GOOG-ROWE-00017998.

5. Attached to my declaration as Exhibit D is a true and correct copy of Plaintiff's Exhibit 7 in support of the Opposition, Bates labeled GOOG-ROWE-00056521.

6. Attached to my declaration as Exhibit E is a true and correct copy of Plaintiff's Exhibit 8 in support of the Opposition, Bates labeled GOOG-ROWE-00059596.

7. Attached to my declaration as Exhibit F is a true and correct copy of Plaintiff's Exhibit 9 in support of the Opposition, Bates labeled GOOG-ROWE-00059853.

8. Attached to my declaration as Exhibit G is a true and correct copy of Plaintiff's Exhibit 10 in support of the Opposition, Bates labeled GOOG-ROWE-00056990.

9. Attached to my declaration as Exhibit H is a true and correct copy of Plaintiff's Exhibit 12 in support of the Opposition, Bates labeled GOOG-ROWE-00017412.

10. Attached to my declaration as Exhibit I is a true and correct copy of Plaintiff's Exhibit 15 in support of the Opposition, Bates labeled GOOG-ROWE-P-00004553.

11. Plaintiff submitted Exhibits B-I to Chambers via e-mail the evening of December 1, 2018. Plaintiff also included documents Bates labeled GOOG-ROWE-00017589, and GOOG-ROWE-P-00001737 in that submission.

12. Portions of Exhibits B-I Google requests remain under seal have been redacted for purposes of this public filing, per Your Honor's Individual Practices, Rule 2.E, and unredacted copies will be submitted to Chambers.

13. Attached to my declaration as Exhibit J and true and correct excerpts of the deposition of Stuart Vardaman, which took place on November 17, 2020.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES THAT THE FOREGOING IS TRUE AND CORRECT.

Signed on the 4th day of December, 2020 in Jersey City, New Jersey.


Sara Tomezsko